

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Elgin Sweeper Company
Attn: James Feltes
1300 West Bartlett Road
Elgin, Illinois 60120

Application No.: 73050361

I.D. No.: 031438AAW

Applicant's Designation:

Date Received: September 2, 2003

Subject: Coating Booths and Drying Ovens

Date Issued:

Expiration Date:

Location: 1300 West Bartlett Road, Elgin

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of five coating booths with two drying ovens, pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year of VOM, 10 tons/year for a single HAP and 25 tons/year for totaled HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Pursuant to 35 Ill. Adm. Code 218.204(j) (2) (A) "Air dried extreme performance coating to miscellaneous metal parts and product coating", the VOM content of the coatings applied to miscellaneous metal parts shall not exceed 3.5 lbs of VOM per gallon of coating minus water and any compounds specifically exempted from the definition of VOM. This permit authorizes operation of the coating booths based on an ongoing demonstration of compliance with 35 Ill. Adm. Code 218.204(j) (2) (A).
- 3a. The total coating usage and associated VOM emissions shall not exceed the following limits:

<u>Coating Usage</u>		<u>Maximum VOM Content</u> (Lb/Gal)	<u>VOM Emissions</u>	
<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
1,765	14,100	3.5	3.1	19.1

The monthly VOM emission limits are based on the maximum coating usage allowed in a month and the maximum VOM content (minus water and exempt compounds) of all coatings used and a 13 percent recovery rate of VOM in the paint sludge collected to be sent offsite for disposal. The annual VOM emission limits are based on the maximum coating usage and a weighted average VOM content (minus water and exempt compounds) of all coatings used and a 13 percent recovery rate of VOM in the paint sludge collected to be sent offsite for disposal.

The emissions of VOM shall be determined as follows:

Emissions = Actual Coating Usage x VOM Content of the Coating

- b. The cleanup solvent usage and associated VOM emissions shall not exceed the following limits:

Cleanup Solvent Usage		VOM Content	VOM Emissions	
<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Weight %)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
2,330	9.3	100	1,211.6	4.84

The VOM emission limits are based on the maximum allowable usage rate and maximum VOM content of the cleanup solvent used and a 48 percent recovery rate of cleanup solvent for reuse or to be sent offsite for disposal.

- c. The parts washer solvent usage and associated VOM emissions shall not exceed the following limits:

Parts Washer Solvent Usage		VOM Content	VOM Emissions	
<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Weight %)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
875	4.0	100	87.5	0.40

The VOM emission limits are based on the maximum allowable usage rate and maximum VOM content of the parts washer solvent used and a 90 percent recovery rate of parts washer solvent for reuse or to be sent offsite for disposal.

- d. Compliance with the above limits shall be determined from a running total of 12 months of data, i.e., current months data plus the preceding 11 months.
4. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

5. This permit is issued based on negligible emissions of particulate matter from the two powder spray coating lines. For this purpose emissions from all such sources shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
6. Emissions and operation of natural gas combusted for the two powder spray coating lines shall not exceed the following limits:

Total Firing		E M I S S I O N S							
Rate	NO _x	CO		PM		VOM			
(mmBtu/Hr)	(Lb/Hr) (T/Yr)	(Lb/Hr) (T/Yr)	(Lb/Hr) (T/Yr)	(Lb/Hr) (T/Yr)	(Lb/Hr) (T/Yr)	(Lb/Hr) (T/Yr)	(Lb/Hr) (T/Yr)	(Lb/Hr) (T/Yr)	(Lb/Hr) (T/Yr)

12.0 1.20 5.26 1.02 4.47 0.091 0.40 0.066 0.29

These limits are based on standard emission factors and 8,760 hours/year. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 7a. Pursuant to 35 Ill. Adm. Code 218.211(c), the Permittee shall collect and record all of the following information each day for each coating line:
 - i. The Name and identification number of each coating as applied on each coating line.
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
- b. The Permittee shall also maintain the following records to check compliance with the limitations of this permit:
 - i. Volume of each coating used in gallons/month and gallons/year.
 - ii. Amount of waste paint sludge sent off site for reclamation or disposal in gallons/month and gallons/year.
 - iii. The weight of VOM per volume of waste paint sludge analyzed semi-annually.
 - iv. Name and identification of all cleanup solvents used and parts washer solvents used and their usage rate in lbs/month and tons/year.
 - v. VOM content of each cleanup solvent and parts washer solvent used in weight percent.
 - vi. Amount of cleanup solvent and parts washer solvent reclaimed for reuse or sent offsite for disposal.
 - vii. Monthly records of hazardous air pollutant content of all coatings, cleanup solvents and parts washer solvents.

- viii. Monthly HAP emissions from use of all coatings, and cleanup solvents and parts washer solvents. Annual HAP emissions shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Unit in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year:
- a. Annual coating usage
 - b. Average daily weighted average VOM content of the coatings for the year.
 - c. Annual cleanup solvent usage.
 - d. Annual parts washer solvent usage.
- If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.
10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that the woodworking operation with cyclone and a wet scrubber, grinding operation with a cyclone, two sanding booths and space heaters, are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(aa) and (d).

If you have any questions on this, please call John Blazis at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JPB:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions of Elgin Sweeper Company manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, e.g., amount of coatings used.

1. Emissions of volatile organic material from the facility wide operation:

- a. The total coatings usage and associated VOM emissions:

VOM Emissions
(Tons/Year)

19.1

- b. Cleanup solvent usage and associated VOM emissions:

VOM Emissions
(Tons/Year)

4.84

- c. Parts washer solvent usage and associated VOM emissions.

VOM Emissions
(Tons/Year)

0.40

- d. Emissions of VOM from all other activities at the facility:
0.52 tons/year

Total Facility Wide VOM = $19.1 + 4.84 + 0.40 + 0.52 = 24.86$
Tons/Yr

2. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

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